

COVENANT  
HEALTH

*Our Name Is Our Promise*

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BY: \_\_\_\_\_

May 26, 2021

Larry Carbonneau, MBA, Manager, Healthcare Compliance and Operations  
Richard S. Lawrence, Senior Health Care Financial Analyst  
Division of Licensing and Certification  
Maine Department of Health and Human Services  
41 Anthony Avenue  
11 State House Station  
Augusta, Maine 04333-0011

Re: Certificate of Need: Letter of Intent  
Covenant Health, Inc. Assumption of Membership Interest of Bangor  
Nursing and Rehabilitation Center

Dear Mr. Carbonneau and Mr. Lawrence:

Pursuant to Section 71.05 of the Department of Licensing and Regulatory Services regulations governing Certificate of Need ("CON") for Nursing Facility Level of Care Projects, we respectfully submit this letter of intent and request a ruling regarding the applicability of CON review for Covenant Health, Inc's ("Covenant") proposed assumption of the sole membership interest of Bangor Nursing and Rehabilitation Center ("BNRC").

BNRC operates a 60-licensed bed skilled nursing center currently operating 56 beds located at 103 Texas Avenue, Bangor, Maine. BNRC provides long-term care, rehabilitative care and memory care services to the elderly. Covenant has had a long-standing relationship with BNRC dating back to 2013, providing management and consultative services. Covenant proposes to assume the sole membership interest in BNRC.

Covenant is an innovative Catholic regional health delivery network and a leader in values-based, non-for-profit health and elderly care. Covenant consists of hospitals, skilled nursing and rehabilitation centers, assisted living residences, and community-based health and elder care organizations throughout New England and in Pennsylvania. It is committed to the health of the individuals and communities it serves and strives to offer a continuum of high quality care. Covenant has long-established expertise in Acute Care, Adult Day Care, Alzheimer's Special Care, Assisted Living and Congregate Housing Home Care Services, Hospice/Palliative Care, Independent Elderly Housing, Outpatient Care, Residential Care, Short-Stay

Rehabilitation, Skilled Nursing and Long-Term Care and Wellness/Prevention Programs.

Covenant currently operates 11 post-acute care facilities with an existing facility in Biddeford, Maine (St. Andre Health Care Facility) and Lewiston, Maine (St. Mary's d'Youville Pavilion). St. Andre Health Care Facility in Biddeford is a 96-bed skilled nursing facility offering rehabilitation and skilled medical care. St. Mary's d'Youville Pavilion is 210-bed skilled nursing facility offering rehabilitation, memory care and skilled medical care. Covenant also has management and consulting relationships with many skilled nursing facilities, including BNRC. Finally, Covenant operates St. Joseph Hospital, a 112-licensed bed acute care hospital, located in Bangor, Maine.


The Board of Directors of BNRC has determined that it's in the best interest of the continued successful operation of the facility for Covenant to acquire ownership of the facility and assume its operations. BNRC and Covenant have entered into a membership interest assumption agreement under which Covenant will become the sole member and assume responsibility for the continued operation of BNRC.

Covenant requests a determination of whether this assumption of membership interest is subject to review. It respectfully requests that the Department issue a response letter indicating whether the proposed assumption of membership interest is subject to review and, if it is, Covenant would ask to schedule a technical assistance meeting.

If you have any questions, please let us know. We look forward to working with you and your staff.

Sincerely,

Covenant Health, Inc.

By:   
John D. Newman, Esq.

Senior Vice President & General Counsel

cc: Stephen J. Grubbs, CEO & President  
Richard Lugli, VP & Deputy General Counsel